Rev. November 2013

FRESHPOINT DALLAS, INC.
NEPOTISM POLICY

Sysco Corporation (FreshPoint Dallas, Inc.) recognizes that it is in the best interest of both the Company and its associates to avoid conflicts of interest between work-related and family-related obligations, to reduce favoritism or the appearance of favoritism and to prevent family conflicts from affecting the workplace. In these conflicted situations, all parties, including supervisors, leave themselves open to charges of inequitable consideration in decisions concerning work assignments, transfer opportunities, performance evaluations, promotions, demotions, compensation, disciplinary actions and discharge. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried into day-to-day working relationships

To address these issues, the Company has implemented this Nepotism Policy. This policy applies to all Sysco associates enterprise-wide.

The Company wishes to continue its long and successful history of encouraging relatives of associates to join the Sysco family. The Company's philosophy is that relatives of associates should develop their careers in different departments so that there will not be a conflict of interest. Relatives may not work in a situation where employment may pose difficulty for supervision, security or morale or create a conflict of interest. Disclosure is required in advance of a hiring or promotion or change of position, which would create a potential relationship conflict. At Sysco's Corporate office, the Executive Vice President with oversight of the department and the Senior Vice President of Human Resources (or designee) will make the determination of whether any such associate relationship poses difficulty for supervision, security or morale or creates a conflict of interest. At the operating company level, the Company's local Market President for Broadline companies or Senior Vice President of Operations with oversight for Specialty companies will make the determination of whether any such relationship poses difficulty for supervision, security or morale or creates a conflict of interest.

No associate may work in a position where his or her supervisor or supervisor's supervisor is a "Relative." "Relative" refers to (1) spouse or former spouse, including common-law spouses and domestic partners, (2) child, parent, sibling, grandparent, grandchild, aunt or uncle (including corresponding in-law and step-relations), and (3) niece, nephew or first cousin. This nepotism policy also prohibits employment situations in which a Relative would audit the work of the associate or the associate would audit the work of the Relative or a situation in which the interest of the Relative and associate would have the potential to create an actual or apparent conflict of interest.

All leaders are expected to use appropriate judgment and make decisions consistent with this policy when employing relatives in their organizations even if there is no direct or secondary reporting relationship. Furthermore, all associates who have a Relative or Relatives employed by the Company or any of its operating companies, must complete a Disclosure Form Pursuant to Nepotism Policy ("Disclosure Form") providing the information requested on the Form for each Relative. Such disclosure will be made to the Company's Senior Vice President of Human Resources on an annual basis. The Senior Vice President of Human Resources will provide such disclosures to the Chairman of the Company's Board of Directors, the Chief Executive Officer, the

General Counsel and the Chairman of the Corporate Governance and Nominating Committee (the "Committee") of the Board of Directors on an annual basis. All Relatives of members of the Company's Board of Directors (other than corporate officers who also serve on the Company's Board of Directors) will be excluded from consideration for employment by the Company.

If any of the above prohibited situations should occur, attempts will be made to find a suitable position within the Company to which one of the associates may transfer and/or to assign job duties so as to minimize problems of supervision, safety, security and morale. If accommodations of this nature are not feasible, the associates will be permitted to determine which of them will resign. If the associates cannot reach such a decision, unless the Corporate Governance and Nominating Committee of the Board of Directors provides a waiver of such prohibited situation, the Senior Vice President of Human Resources will determine who will remain employed. The aforementioned prohibition includes seasonal or temporary workers.

This policy shall be administered by the Company but overseen by the Committee. All determinations by the Committee as to the applicability of this policy to any employment question shall be binding on the Company, its associates and members of its Board of Directors. Notwithstanding the foregoing, this policy shall not apply to the extent that any applicable state law prevents the enforcement hereof.

Nepotism Policy

Acknowledgement of Receipt & Disclosure

I have received and read the Company Nepotism Policy. I accept my responsibility for complying with the policy and associated guidelines and rules. I understand that violations of Company policies are subject to disciplinary action, up to and including termination.

I understand my responsibility to disclose relatives working for this company and/or other Sysco locations.

Name (Print) _____

Signature _____

Date _____

Department _____

Location _____

Good things come from Sysco®